

EXHIBIT 2

JUSTIN GUY
July 15, 2021

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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

JUSTIN GUY, individually and on behalf
of those similarly situated,

Plaintiff,

Case No. 20-cv-12734-MAG-EAS

vs

HON. MARK A. GOLDSMITH

ABSOPURE WATER COMPANY, L.L.C., a
domestic limited liability company,
Defendant.

_____/

ZOOM DEPOSITION OF JUSTIN GUY
Taken on the 15th of July, 2021, at 10:10 a.m.

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1 APPEARANCES:

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ALSO PRESENT: Patrick Byrne

12 Mari Yokhana

13 REPORTED BY: Wendy L. DeMatio, CSR 3851

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1 about whether they told him or didn't tell him.

2 Q (BY MR. ACHO): When did you find out that Absopure was
3 not going to pay you overtime?

4 A When I worked my first week of 50 hours and I didn't get
5 paid over that 40-hour mark.

6 Q Okay, okay. And did you complain to the supervisor?

7 A Yeah, I always complained, but I --

8 Q You always complained? You always complained?

9 A I was just a little black kid, and they --

10 COURT REPORTER: I'm sorry, I'm sorry, whoa,
11 whoa. I'm getting a lot of overlap. Please ask your
12 question, Mr. Acho.

13 Q (BY MR. ACHO): Which supervisor did you complain to?

14 A I complained to all of them. Tony, Alex, Art, and --

15 Q And what did they tell you when you -- what did they tell
16 you when you complained?

17 A Well, Art, he made it to where he was basically just
18 saying -- like he did make it to where I could make some
19 more money. He gave me a personal route, like I had a
20 route that was mine. That's what he did when I started
21 complaining.

22 Q I didn't ask you -- what did he say about the overtime?

23 A But I complained -- are you listening or am I not talking
24 clear? You asked me a question, I answered it. When I
25 was telling him about complaining -- when I was

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1 **complaining, he offered me a better route to make more**
2 **money.**

3 Q To make more money. Oh, that's the commissions, right?

4 A **That's what he offered me in order of overtime. He said**
5 **he would just give me more money to do a better route.**

6 Q And did you make more money on a better route?

7 A **I had to work longer, and I still didn't get paid**
8 **overtime.**

9 Q Well, but there are days and weeks where you made a lot
10 more money than had you been hourly and got paid
11 overtime. You're not denying that, are you?

12 A **That's not correct.**

13 Q Well, I was told some days, I mean, you got -- you knew
14 how much you made every day, didn't you?

15 A **Yes.**

16 Q You knew it. So every day you were aware of what you
17 were getting, which did not include overtime, correct?

18 A **No.**

19 Q No, what?

20 A **No, it didn't include overtime.**

21 Q But you knew it every single day, right?

22 MR. HANNA: Object to form.

23 THE WITNESS: I didn't know I wasn't supposed
24 to be paid -- overtime is over eight hours a day, and I
25 was working over eight hours a day.